

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

Civil Action No. 11-cv-570

RASHARD MENDENHALL,

Plaintiff,

v.

HANESBRANDS INC.

Defendant

**JOINT MOTION FOR ENTRY OF
PROPOSED STIPULATED
PROTECTIVE ORDER**

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

COME NOW Plaintiff Rashard Mendenhall and Defendant Hanesbrands Inc. (collectively the “Parties”) by and through their undersigned counsel of record and respectfully move this Court to enter the proposed Protective Order attached hereto as **Exhibit A**.

The Parties acknowledge and agree that discovery in the above-styled action will involve the production or disclosure of some documents, materials, information and/or testimony that may comprise confidential, proprietary, and/or trade secret information. Prior to filing this Motion, the Parties stipulated and agreed to the form and substance of a protective order regarding such information. Accordingly, the Parties respectfully request that this Court enter the proposed Protective Order attached hereto.

Dated:

August 28, 2012

For Plaintiff:	For Defendant:
<p><u>/s/ Steven J. Thompson</u> Steven J. Thompson sjthompson@uhlaw.com Richard H. Tilghman IV rtilghman@uhlaw.com UNGARETTI & HARRIS LLP 3500 Three First National Plaza Chicago, IL 60602 Telephone: 312-977-4400 Facsimile: 312-977-4405</p> <p><u>/s/ David W. Sar</u> David W. Sar N.C. State Bar No. 23533 dsar@brookspierce.com Eric M. David N.C. State Bar No. 38118 edavid@brookspierce.com BROOKS, PIERCE, MCLENDON, HUMPHREY & LEONARD, L.L.P. 230 North Elm Street, Suite 2000 Greensboro, NC 27401 Telephone: 336-373-8850 Facsimile: 336-278-1001</p>	<p><u>/s/ Brendan J. O'Rourke</u> Brendan J. O'Rourke borourke@proskauer.com Victoria L. Loughery vloughery@proskauer.com Proskauer Rose LLP 11 Times Square New York, NY 10036 Telephone: 212-969-3000 Facsimile: 212-969-2900</p> <p><u>/s/ John F. Morrow, Jr.</u> John F. Morrow, Jr. jmorrow@wcsr.com Womble Carlyle Sandridge & Rice One West Fourth Street Winston-Salem, NC 27101 Telephone: 336-721-3600 Facsimile: 336-721-3660</p>